

### Enforcement History of United Rigging Site

May 1, 1985 Maryland serves a search warrant and gathers samples and and seizes United Riggings' records. Sample results reveal extremely high PCB levels.

May 8 At the request of the State of Maryland, EPA conducts a preliminary assessment. Oral notice given to United Rigging. Maryland requests that Oral notice not be given to parties other than United Rigging at this time due to an ongoing state investigation.

May 9 EPA enforcement (Aitken), arrives on site and participates in a meeting with OSC, Maryland and United Rigging. PCB burning orally confirmed by United Rigging. United Rigging states for the record that they will assert a third party defense.

May 13 10 Point document signed by Laskowski. \$275,000 level includes \$50,000 funding.

May 20 Oral notice given to Pepco and Electric Equipment Corporation.

May 21 Meeting onsite between United Rigging, Pepco, OSC, Maryland, Electric Equipment Corporation, and EPA enforcement. Draft Unilateral Order handed out by Aitken to above parties. Written notice given to Pepco and United Rigging.

May 23 Pepco consultant appears on site to gather technical data.

May 29 Clean Up plan submitted by United Rigging and Pepco.

June 10 All parties except EEC and Maryland meet in Philadelphia to discuss Clean Up plan and Consent Order. EPA TSCA informs everybody that the cleanup must be to a background level.

June 11 Meeting in Philadelphia between United Rigging, Maryland, Pepco, and EPA to input Maryland's comments to the previous meeting. Mike Powell from the Maryland Attorney General's Office states that background or a site closure plan will be required. A state signature will be added to the Consent Order. A concern is raised that EEC may be unable to remove the transformers that they have in storage. It is agreed that if EEC is unable to remove the transformers that EPA will take them out using CERCLA monies.

June 13 Revised Clean Up plan submitted by United and Pepco. 25 ppm is the new clean up level. Not acceptable to EPA or the state.

June 17 Revised 10 Point for \$675,000 funding increase is held in RA's office due to possibility of responsible party cleanup.

June 20 Telephone call between EPA, Maryland, and Pepco to discuss technical aspects of the clean up work. Pepco brass listening in order to present proposal to higher management.

June 21 OSC demobed site due to need to conserve remaining funds. \$ 227,000 expended out of \$ 260,000. \$ 15,000 being held in reserve to respond to emergency at site. OSC intending on twice weekly site inspection using local subcontractor, and repair of underflow structures after each significant rainfall. Remaining funds should last for about two weeks (July 5). Additional funding request returned to OSC to hold pending resolution of EEC issue and Consent Order agreement.

June 25 Revised Clean Up plan submitted by United and Pepco. 15 ppm is the cleanup level. This is considered background and is acceptable to EPA and the state. Current price tag on all Consent Order work is \$ 2,500,000.

June 26 Revised Consent Order typed in Philadelphia.

July 8 Pepco trailer onsite. Engineering firm hired to develop soil erosion plan in conformance with Prince George County regulations.

July 11 Meeting onsite to discuss soil erosion plan, SPCC plan. Soil erosion plan orally approved by Caron.

July 12 Meeting onsite with United Rigging and Pepco. United agrees to move balance of EEC transformers to holding cell and to clear suspected burial area of heavy debris.

July 15 EEC informed Caron and Isaacs that they are unable to pay for cleanup.

Bids opened for major portion of cleanup.

July 25 Contract awarded to Chemical Waste Management.

July 26 EEC met with EPA legal staff to discuss their poor financial situation. Possibility of cash contribution at the end of the cleanup.

July 30 10 Point approved for removal of the EEC transformers.

August 2 Consent Order signed off by James Seif, EPA Regional Administrator.

August 6 Gordon Gemunder of EEC onsite. Gordon stressed the fact that his firm was willing to cooperate and open its books to EPA.

August 12 & 13 Aitken and Janosik onsite to monitor cleanup. Straw bales in place around areas of concern, sampling has begun.

August 20 & 21 Janosik and Chow onsite to monitor cleanup. Transformers containing less than 50 ppm are being emptied into storage container. Surface material from area C is being loaded into container trucks. Each truck is hauling about twenty tons of material (fourteen cubic yards). Each ton is costing out at \$200 per ton with the landfill located at Model City, New York. Problems encountered installing sedimentation basin in Area C due to concrete f

#### INFORMATION LOST

Area C. These transformers are being held pending state approval for disposal.

OSC remobilized to complete treatment and disposal of EEC transformers. Total EPA removal costs estimated at \$450,000.

September 9 & 10 Aitken onsite to monitor cleanup. All transformers greater than 500 ppm have been removed from site. Sampling underway to determine depth of soil to be excavated and removed in Area C.

Aitken met with United Rigging to update them on the progress of the cleanup.

Janosik onsite September 10 and 11 to assist in monitoring cleanup. Oil booms placed at weirs in sedimentation basins.

September 16 & 17 Aitken onsite to monitor cleanup. CAT 225 with transformer grapple brought onsite to speed up work in Area A. Additional hose being used to upgrade dust control. Shott onsite 9/17 to assist in monitoring cleanup. >50 ppm transformers filled with diesel fuel for 18 hours. One transformer could not hold the diesel fuel and the entire contents emptied upon the ground. Absorbant used to mop up spillage. The spill was contained.

September 18 Aitken, Shott, and the state of Maryland attended a public meeting at the local elementary school. The only major questions seemed to concern dust control onsite and the presence of asbestos. EPA announced that todate, 114 truckloads of debris and soil had been removed to Model City. In addition, 524 transformers had left the site, including all of those > 500 ppm.

September 23 & 24 Aitken onsite to monitor cleanup. Caron updated on progress of cleanup. Caron almost fully involved with West Virginia site, but available by phone. Soil in Area C has been excavated to a depth of 36 inches at the "hot spot". EPA coordinated a meeting between Pepco, United Rigging, and the County Health Department to resolve the asbestos issue. United is working on its removal. 696 Transformers and 158 truckloads of debris and soil have left the site. Small oil seeps in Area A contained by absorbant. These seeps were caused by the rain saturating the



absorbant material in Area A. United was advised of the problem by Aitken. Aitken further contacted the state of Maryland and requested that they tour the site in order to update them as to progress of the cleanup. At current time, cleanup is on schedule with completion set for the end of October.

September 27

Hurricane Gloria passed over the site, dropping approximately five inches of rain. Aitken spoke with Armstrong of Pepco and requested additional absorbent boom around the sedimentation ponds.

Bags of buried asbestos were uncovered in Area C. United Rigging hired a contractor to dispose of them in accordance with all applicable regulations. Wooten of the County Health Department made an onsite inspection.

September 30

Aitken and Nalipinski onsite to monitor cleanup. Nalipinski gathered information in order to develop score for possible ranking on the NPL.

Unidentified person walking at the base of Area C, in the clean zone. He stated that he was from EPA. When asked for identification he ran to his car and drove away at a high rate of speed.

Additional four inches of soil was removed in area C due to levels exceeding 15 ppm.

Meeting held onsite between Maryland, Pepco, and EPA to address status of cleanup. All parties pleased with progress to date. EPA to do further stream sampling in order to address local citizen concerns about offsite migration.

All transformer oil and diesel fuel flush has been incinerated.

Pepco is going to a six day per week schedule effective immediately in order to stay on schedule and allow for possible bad weather.

Maryland and EPA split three samples with Pepco.

Excavation pits were begun between the sedimentation basins in Area C and the F four drainage area. If hot, an additional 500 yards of fill may have to be removed.

October 1

Aitken onsite to monitor cleanup. EPA met with United Rigging to update them as to the status of the cleanup.

The remaining drum of diesel flush left over from the EPA removal was accidentally crushed by the CAT 225. All soil affected by the spill was removed and added to the soil going to Model City. There was no standing liquid in the drum, so it was added to the soil.

Road scraping began on the access road. They will remove one inch.

As of COB all transformers with the exception of three EEC overhead electrical breakers that are being stored for reuse have departed site. The final count of removed Pepco transformers totals 787. Of these 15 were greater than 500 ppm. 202 loads of debris and soil have been sent to Model City.

United Rigging toured site with Pepco and EPA.

Pepco advised by Maryland that the decon water from the truck washing must show non detectable levels of PCBs or that it may not be discharged. Pepco has used Alum to flock the solids out of the water in an effort to meet this level.

Red drum discovered in sand staging area. Caron contacted in West Virginia. Appears to have been left over from EPA removal.

October 7 & 8

Aitken onsite to monitor cleanup. Pepco lost several days of work due to rain in the past week. Soil excavation continuing in Area C.

Area A results show only one sample > 10 ppm. This area will be scraped and the resulting spoil shipped to Model City.

EPA, County Health Department, and Pepco toured the site. Additional transformer shell pointed out by EPA. Shell is empty and apparently was moved with debris from the C area.

United Rigging filed a \$90,000,000 lawsuit against Pepco. This has a detrimental affect on the working relationships onsite.

245 trucks of debris and soil have left site as of COB 10/8.

Clean backfill arriving and being staged in anticipation of getting Area C certified clean (>15ppm). Pepco has arranged for a soil testing service to verify the compaction tests in conformance with Prince Georges' County regulations.

EPA informed by Maryland that public meeting is now being held October 16th.

EPA extensively coordinating with all parties in an effort to get Area C certified as clean pending receipt of samples < 15ppm. Area C is critical in the timetable due to the length of time needed to backfill and compact, and then to use it as a staging area for material currently located in Areas B and D.

Additional Area E samples taken in order to complete grid. Initial results from Area E indicate some contaminated asphalt.

October 16 & 17

Aitken onsite to monitor cleanup. Area C has been completely backfilled with claylike material. A four inch crushed stone topping has been applied to the fill material. A minor area of Area C will have to be reopened in order to remove some buried asbestos.

Area F-4 has been sampled, and has been scraped to a depth of about one foot. Some trees had to be removed in order to accomodate the excavating equipment.

Area E testing is continuing, with results generally indicating onl surface contamination. Area E is being vacuummed to remove surface soil and rocks, and will be pressure washed to remove the surface contamination.

A public meeting was held at the local community center at the request of the local citizens. Both Maryland and EPA cochaired the meeting. EPA and the state agreed to take several background samples to address concerns that PCB's had migrated offsite and wer not being removed.

Aitken interviewed by Don Comis of the Tri-County Free Press.

United Rigging people removing debris from remainder of unscraped site. When these areas are free of debris, final scraping and resampling will begin.

Aitken continuing to co-ordinate extensive site operations between Pepco, Md, County Health Department, and EPA. Lawsuit has impaired working relationship between onsite Pepco personnel and United Rigging personnel.

As of COB 10/16 309 trucks of debris and soil have left site.

Aitken investigating claim that several of the EEC transformers tha were certified by EPA as clean and sent to Virginia contain PCB filled capacitors.

October 21 & 22 Aitken onsite to monitor cleanup. Heavy rain slowing down cleanup.

As of COB 10/18 330 trucks of debris and soil have left site.

A formal meeting was convened at the Pepco trailer in order to upda all parties as to the status of the cleanup. Maryland was unable t attend, but was briefed by phone. An extension until 12/1 was agreed upon by all parties as a completion date for the work listed in the Consent Order. Pepco will prepare a memo confirming this da Pepco and United requested that a person be available at all times in order to speed up the sampling and thus more quickly speed certification of the cleaa areas onsite. EPA, Maryland and the Cou are pitching in to meet this request.

The decontamination water and the water in the sedimentaion ponds can be incinerated at Pepco's Morgantown high temperature boiler.

Aitken, after conferring with Maryland and Caron, authorized destru of the 10% splits being held by Chem Waste.



October 23 Asbestos uncovered in Area D. United Rigging made arrangements to remove asbestos through contractor.

October 24 Aitken called by Pepco regarding possible oil seep in the hill area. Samples were taken of the area by Pepco, Aitken contacted the 24 hr hotline for reporting purposes. Maryland, the County, and Bob Caro notified. Pepco installed straw bales and absorbent around the suspected seep area.

October 29 Truck decontamination pad removed.

October 30 & November 1 Aitken onsite to monitor cleanup. Pepco making arrangements to bury decon water at high temperature boiler. Maryland is requiring a discharge limitation of 1 ppt for the decon water. Pepco is unable to get it down to this level.

401 trucks of debris and soil as of COB 11/1.

Area E still being washed down.

November 4 & 5 Aitken onsite to monitor cleanup. F-3 swale is still showing PCB levels > 3 ppm despite repeated soil scraping.

Extensive rain is impacting the project.

The initial attempt to decontaminate the underground pipe in F-2 was stopped due to encountering an obstruction in the pipe.

420 trucks of debris and soil as of COB 11/5.

November 13 & 14 Aitken onsite to monitor cleanup. An old septic tank line was punctured in the F-2 swale. The County Health Department confirmed that it was a septic system.

The underground pipe cleaning has been completed.

F-4 has been seeded, with a flow dissipater installed.

Soil removal continuing in F-2, and F-3.

November 18 & 19 Aitken onsite to monitor cleanup. Area A being paved.

Areas B and C are now totally cleaned.

Area D needs minor work.

F-1 has been sodded. Some minor paving remains to be done.

F-2 and F-3 are being scraped as necessary to remove hot spots.

F-4 has been completed.

512 trucks of soil and debris as of COB 11/19.

Backfill arriving for F-2 area. Plastic pipe being used to route water under roadway.

November 25 & 26 Aitken onsite to monitor cleanup. Maryland, the County, Pepco and EPA toured the site.

Swale sample in F-3 showed low levels of naphthalene and other compounds in the soil.

Maryland took four soil samples and one liquid sample from the hill area. This area was not sampled during the original assessment.

Area D being backfilled and compacted.

Chemical Waste Management Co. has begun demobilization of their equipment.

Stone dust is being laid in Area D.

December 2 & 3 Aitken onsite to monitor cleanup. One hill sample shows 66 ppm. Pepco laid out a 25 foot grid around the sample and will attempt to determine the extent of the contamination.

The drainage samples are still coming out > 3 ppm. Pepco will extend the sampling points along the drainage pattern until the results are clean. Pepco will then remove the contaminated soil and resample.

Maryland drilled into Area D to a depth of eight feet on 12/2.

Bulldozer still grading in F-2 in order to comply with the County erosion control plan.

December 4 Aitken informed by Caron that Model City is out of EPA compliance. After extensive phone calling and talking, Model City back in compliance on 12/9.

December 9 & 10 Aitken onsite to monitor cleanup. Pepco continuing work on the hill area. Maryland auger samples are relatively clean. 531 trucks of soil and debris as of COB 12/9.

Onsite meeting and site walkthrough held 12/9 between all parties.

Areas F-2 and F-3 have been hydroseeded.

December 16 & 17 Aitken onsite to monitor cleanup. Some oil still present at F-2. Absorbent in place to catch oil.

All sampling points except swale # 8 are clean. Final site grading underway. Pepco to consider field work complete upon receipt of manifests from Model City.

552 Trucks of soil and debris as of COB 12/16.



December 17      Aitken onsite to monitor cleanup. Pepco demobbing command post.  
Site security has been eliminated.

Aitken and Wooten completed stream sampling. Wooten completed  
3 house samples on 12/18. Results received late December showed  
extremely low levels of PCBs in all samples.

January 6      Armstrong called Aitken to state that all manifests had been  
received from Model City. Site work is now complete.